

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
DAVID PETRUCELLI , a/k/a "Lefty,"	:	VIOLATIONS:
SUE SAWYER	:	21 U.S.C. § 846 (conspiracy to distribute
DEIJA SHEDLER,	:	50 grams or more of methamphetamine
a/k/a "Deija Stedler,"	:	(actual) -1 count)
KEVIN BOWYER	:	21 U.S.C. § 846 (attempted possession
	:	with intent to distribute 50 grams or
	:	more of methamphetamine (actual) - 2
	:	counts)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. From in or about August 2005, through on or about May 22, 2007, in the Eastern District of Pennsylvania, and elsewhere, defendants

DAVID PETRUCELLI,
 a/k/a "Lefty," and
DEIJA SHEDLER,
 a/k/a "Deija Stedler,"

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that between in or about August 2005, and in or about May 2007:

2. Defendants DAVID PETRUCELLI and DEIJA SHEDLER agreed to supply Sue Sawyer with methamphetamine.
3. Approximately twice a month for the duration of the conspiracy, Sue Sawyer either deposited money directly into defendant DAVID PETRUCELLI's bank account or mailed cash from the Eastern District of Pennsylvania to defendants DAVID PETRUCELLI and DEIJA SHEDLER in the District of Arizona to pay for each shipment of methamphetamine.
4. Defendants DAVID PETRUCELLI and DEIJA SHEDLER charged Sue Sawyer between \$800 and \$1,000 per ounce of methamphetamine.
5. After receiving the cash payments from Sue Sawyer, defendants DAVID PETRUCELLI and DEIJA SHEDLER placed vacuum-sealed methamphetamine inside a stuffed animal or toy and then sent the methamphetamine from the District of Arizona via the United States mails to Sue Sawyer in the Eastern District of Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants DAVID PETRUCELLI and DEIJA SHEDLER, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. In or about August 2005, Sue Sawyer called defendant DAVID PETRUCELLI on his cellular telephone, during which they agreed that Sawyer would purchase

methamphetamine from defendant PETRUCELLI.

2. In or about late April 2007, Sue Sawyer sent a package containing approximately \$10,000 in cash through the United States mails from Easton, Pennsylvania to defendants DAVID PETRUCELLI and DEIJA SHEDLER in Peoria, Arizona to purchase methamphetamine.

3. On or about May 2, 2007, defendants DAVID PETRUCELLI and DEIJA SHEDLER sent a package containing approximately 208.1 grams of methamphetamine (actual) through the United States mails from Peoria, Arizona to Sue Sawyer in Easton, Pennsylvania.

4. On or about May 11, 2007, Sue Sawyer sent a package containing approximately \$8,000 in cash through the United States mails from Easton, Pennsylvania to defendants DAVID PETRUCELLI and DEIJA SHEDLER in Peoria, Arizona to purchase methamphetamine.

5. On or about May 16, 2007, defendant DAVID PETRUCELLI signed for and accepted the package containing approximately \$8,000 in cash mailed by Sue Sawyer.

6. On or about May 17, 2007, defendants DAVID PETRUCELLI and DEIJA SHEDLER sent a package containing approximately 136.1 grams of methamphetamine (actual) through the United States mails from Peoria, Arizona to Sue Sawyer in Nazareth, Pennsylvania.

7. On or about May 22, 2007, Sue Sawyer accepted the package containing approximately 136.1 grams of methamphetamine mailed by defendants DAVID PETRUCELLI and DEIJA SHEDLER.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

In or about late April 2007, in Easton, in the Eastern District of Pennsylvania,
defendant

SUE SAWYER

knowingly and intentionally attempted to possess 50 grams or more, that is, approximately 208.1 grams of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 22, 2007, in Nazareth, in the Eastern District of Pennsylvania,
defendants

**SUE SAWYER and
KEVIN BOWYER**

knowingly and intentionally attempted to possess 50 grams or more, that is, approximately 136.1 grams of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Section 846, set forth in this indictment, defendants

**DAVID PETRUCELLI,
a/k/a “Lefty,”
SUE SAWYER
DEIJA SHEDLER,
a/k/a “Deija Stedler,” and
KEVIN BOWYER**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney